

May 9, 2016

**VIA ECF**

Hon. Magistrate Judge Henry B. Pitman  
United States District Court  
Southern District of New York  
500 Pearl Street  
NYNY 10007

Re: James H. Fischer v. Stephen T. Forrest *et al.*  
Docket No. 14cv1304

– and –

James H. Fischer v. Stephen T. Forrest *et al.*  
Docket No. 14cv1307

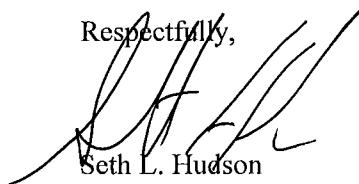
Dear Judge Pitman:

Pursuant to Local Civil Rule 37.2, Defendants request a pre-motion discovery conference to address discovery requests Plaintiff has failed to provide responses.

On August 28, 2015, Plaintiff was served with a second set of Requests for Production of Documents, but no response has been received. Plaintiff was served with a second set of Interrogatories on October 9, 2015 and a third set of Requests for Production of Documents on October 30, 2015, but no response has been received.

The parties conducted an informal conference to discuss the outstanding discovery responses without the need for court involvement. Defendants have granted Plaintiff three extensions to respond to this discovery. To date, Plaintiff has failed to provide any responses to these outstanding discovery requests.

Thank you for your courtesy and attention in this matter.

Respectfully,  
  
Seth L. Hudson

cc: Daniel K. Cahn  
Oscar Michelen